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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

William Richardson,  
Plaintiff,

v.

Department of Homeland Security; U.S.  
Customs and Border Patrol,  
Defendants.

Case No. 2:23-cv-01939-GMN-BNW

**Stipulation to Stay**

Plaintiff William Richardson, and Defendants, Department of Homeland Security and U.S. Customs and Border Patrol, through counsel, stipulate and request that the Court stay this case for a period of 60 days. Since the initiation of this case, the parties have been in discussions to resolve this case without requiring the Court's intervention. The 60-day stay sought will allow the parties additional time to work with their clients towards a possible resolution. The stay is sought in good faith and based on the following:

- 1) Plaintiff filed his Amended Complaint on November 21, 2023.
- 2) Plaintiff served Defendants on November 22, 2023.
- 3) Defendants answered Plaintiff's Amended Complaint on January 5, 2024.
- 4) Since the filing of both the Amended Complaint and the Answer, the parties have engaged in discussions that may result in the resolution of this case without the Court's intervention. Accordingly, the parties seek to stay this case for a period of 60 days,

1 including the filing of a discovery plan/scheduling order. The stay is sought in an attempt  
2 to conserve the parties' and judicial resources. If the parties are able to resolve this case, a  
3 stipulation of dismissal will be promptly filed. If the parties are unable to resolve the case,  
4 the parties will file a joint status report to the Court by **May 6, 2024**. This request is sought  
5 in good faith and not for purposes of delay.

6 Respectfully submitted this 6th day of March 2024.

7  
8 /s/ Skyler H. Pearson  
9 Skyler H. Pearson, Esq.  
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13 *Attorney for Defendant*

**National Security Law Firm, LLC**  
/s/ Brett O'Brien  
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14 **IT IS SO ORDERED**

15   
16 **UNITED STATES DISTRICT JUDGE**

17 **DATED:** March 7, 2024  
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